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*Hardeep Sull*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HARDEEP SULL, an individual,  
  
Plaintiff,  
  
v.

STATE OF NEVADA, ex rel. NEVADA  
STATE BOARD OF DENTAL  
EXAMINERS, an agency of the State of  
Nevada; STATE OF NEVADA, ex rel.  
NEVADA DEPARTMENT OF  
ADMINISTRATION, an agency of the State  
of Nevada; DOES I through X, inclusive; and  
ROE ENTITIES 1 through 10, inclusive,  
  
Defendants.

Case No. 2:24-cv-02234-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINES ON  
DEFENDANT NEVADA DEPARTMENT  
OF ADMINISTRATION'S PARTIAL  
MOTION TO DISMISS**

**(First Request)**

Stipulation at ECF No. 10 regarding  
motion at ECF No. 5.

Plaintiff Hardeep Sull ("Sull") and Defendant State of Nevada, ex rel. Nevada Department of Administration (the "Department"), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. On December 3, 2024, Defendant State of Nevada, ex rel. Nevada State Board of Dental Examiners ("NSBDE") filed a Notice of Removal of Civil Action to Federal Court (ECF No. 1; hereinafter, the "Notice of Removal"), which initiated this action.

2. At the time NSBDE filed the Notice of Removal, Sull had served a copy of her First Amended Complaint (ECF No. 1-7; "FAC") in the related state court action on the Department.

3. On December 12, 2024, the Department filed a Partial Motion to Dismiss Plaintiff's

1 First Amended Complaint (ECF No. 5; the “Motion to Dismiss”), requesting that the Court dismiss  
 2 Sull’s Seventh Claim for Relief in the FAC. *See* ECF No. 5, at 1, 8. The Court set a hearing on  
 3 the Motion to Dismiss for February 3, 2025. ECF No. 7.

4 4. Sull’s deadline to oppose the motion was automatically set for December 26, 2024,  
 5 and the Department’s deadline to file a reply was set for January 2, 2025. *See* LR 7-2(b). Based  
 6 on the holidays during that time and the schedules of counsel generally, the parties stipulate and  
 7 jointly request that **the Court extend the pending deadlines associated with the Motion to**  
 8 **Dismiss by two weeks, setting a new deadline for Sull to oppose the motion by January 9,**  
 9 **2025, and a new deadline for the Department to file a reply brief by January 16, 2025.**

10 5. The parties agree that this Stipulation is being entered into for the purposes of  
 11 modifying the deadlines referenced herein, and it shall not be construed as an acknowledgement  
 12 or admission of any fact or legal issue, including, but not limited to, any jurisdictional issues, all  
 13 of which are expressly reserved. This is the parties’ first request for an extension of the deadlines  
 14 referenced herein.

15 **IT IS SO STIPULATED.**

16 Dated this 24<sup>th</sup> day of December, 2024.

17 SKLAR WILLIAMS PLLC

18  
 19 /s/ David B. Barney  
 20 Johnathon Fayeghi, Esq. (NBN: 12736)  
 21 David B. Barney, Esq. (NBN: 14681)  
 22 410 S. Rampart Blvd., Suite 350  
 23 Las Vegas, NV 89145  
 24 *Attorneys for Plaintiff*  
 25 *Hardeep Sull*

Dated this 24<sup>th</sup> day of December, 2024.

STATE OF NEVADA OFFICE OF THE  
 ATTORNEY GENERAL

/s/ Cassin T. Brown  
 Cassin T. Brown, Esq. (NBN: 15877)  
 Gregory D. Ott, Esq. (NBN: 54763)  
 100 North Carson Street  
 Carson City, NV 89701  
*Attorneys for Defendant*  
*Nevada Department of Administration*

26 **IT IS SO ORDERED.**

27   
 UNITED STATES DISTRICT JUDGE

December 31, 2024

28 DATED: \_\_\_\_\_